

REMARKS

Applicant has thoroughly considered the Examiner's remarks and the application has been amended in light thereof. Claims 1-3, 5, 7-10, 12-17 and 19-20 are presented in the application for further examination. Claims 1, 7-8, 12, 16 and 19 have been amended by this Amendment A. Claims 4, 6, 11 and 18 have been canceled by this Amendment A. Reconsideration of the application claims as amended and in view of the following remarks is respectfully requested. The following remarks will follow the sequence of the Office action.

Claims 11 and 18 have been canceled so that the objection applied to these claims is no longer applicable. Thus, the objection to the claims should be withdrawn.

Claims 1 and 9 stand rejected under 35 U.S.C. §112. Claim 1 has been amended to refer to the first program and the second program to avoid any confusion. Applicant does not understand the Examiner's rejection with regard to claim 9. It appears that the Examiner is confusing the customer with the participant. As indicated in the preamble of claim 9, the customer selects the motivation package to motivate the participants and thus presents the motivation package to the participants. Thus, it is submitted that claims 1 and 9 are in compliance with 35 U.S.C. §112 so that the rejection should be withdrawn.

Claims 1-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Stoltz in view of Engel. Applicant does not understand the Examiner's comment that Stoltz "does not teach of printing the award after the certificates are redeemed." Applicant does not claim that the awards are printed after certificates are redeemed. In any case, claim 1 has been amended to specify that the motivation package comprises a motivation document selected by the customer via the website from a plurality of motivation documents. In addition, claim 1 has been amended to specify that the motivation package comprises a particular motivation award selected by the customer via the website from the plurality of motivation awards including a gift certificate or a coupon. Stoltz does not teach these aspects of the invention. First of all, Stoltz does not present the customer with a plurality of motivation documents. Although the Examiner speculates that more than one type of document is presented by Stoltz, in fact only one document is illustrated and disclosed in Fig. 8. More importantly, Stoltz does not provide the selection of a motivation award from a plurality of motivation awards. In particular, Stoltz suggests that a link or website may be indicated on the certificate, which link or website can be used by the recipient to redeem

or obtain an award. Thus, Stoltz does not recognize that it is the customer who is presenting the award to the participant and it is the customer who is selecting the particular award that will be provided to the participant.

The Examiner argues that Engel teaches a method where customers connect online to a host and print coupons to be redeemed. Once again this is not an aspect of applicant's invention so it is not understood why Engel is cited in this regard. According to claim 1, the customer (e.g., presenter) selects the motivation award that is embodied in the motivation package, not the participants (e.g., recipients). Thus, it is submitted that claim 1 is patentable over the combination of Stoltz and Engel, as noted above since both of these references in combination are deficient for several reasons.

Claim 9 has not been amended because the Examiner has not adequately addressed the recitals in claim 9. In particular, claim 9 recites that the customer (presenter) selects via a website a category of motivation packages. Thereafter, the customer selects one of a plurality of motivation documents related to the selected category that has been previously selected by the customer. In addition, the customer selects one of a plurality of motivation awards related to the same previously selected category and also related to the selected document and the selected award, all of which to be presented to the participant (recipient) as an integrated motivation package. As previously pointed out with regard to claim 1, Stoltz and Engel fail to recognize that the customer selects the award to be presented to the participant. In addition, neither Stoltz nor Engel categorizes motivation awards and motivation documents and allows the customer to select a category and then to select a motivation document and then to select a motivation award wherein the selected document and selected award are in the same category. Thus, it is submitted that claim 9 is patentable over the combination of Engel and Stoltz and the rejection applied to claim 9 should be withdrawn.

Claim 12 has been amended to specify that the system includes vendor software associated with the website allowing the customer to purchase the selected motivation award. In this regard, the Examiner cites Engel as teaching a method where customers connect online to a host, electronically receive coupons and print the coupons to be redeemed. As noted above, the Examiner herein is confusing customers (presenters) and participants (recipients). According to the system of claim 12, the customer selects the award and purchases the award via the vendor for presentation to the participant. In contrast, Engel teaches that the participant is the one who

connects to the host, receives the coupons and prints the coupons to be redeemed. Thus, claim 12 is patentable over the combination of Stoltz and Engel and the rejection based thereon should be withdrawn.

Claim 16 has been amended to specify that the motivation packages each comprises a particular motivation document and a particular motivation award. Once again, as pointed out above, the combination of Stoltz and Engel do not anticipate or make obvious the selection of both a motivation document and a motivation award by a customer for presentation to a participant. In contrast, Stoltz and Engel suggest that it is the participant that selects the award. Thus, claim 16 is patentable over the combination of Stoltz and Engel and the rejection based thereon should be withdrawn.

Claim 19 has been amended to indicate that the motivation package selected by the customer from a plurality of motivation packages includes a motivation document and a motivation award. Further, claim 19 has been amended to indicate that the print component renders the specifications into a certificate corresponding to the motivation document and that the print component renders the specifications into an award document redeemable by the participant for the motivation award that was selected by the customer. For the same reasons as noted above with regard to the other claims, claim 19 is distinguishable over the combination of Stoltz and Engel because the combination of Stoltz and Engel do not anticipate or make obvious a print component which prints a motivation document and a motivation award selected by the customer and redeemable by the participant.

The remaining claims are dependent upon the above-noted independent claims 1, 9, 12, 16 and 19 and are patentable for at least the same reasons that the independent claims are patentable. Thus, the rejection of the claims based on Stoltz and Engel should be withdrawn.

In paragraph 8 of the Office action, the Examiner takes official notice that a plug-in application has print functions through the internal commands of the web browser. This official notice is taken with regard to claims 7 and 15. However, these claims relate to the second program which is associated with the customer, the participant or an agent for rendering both the particular motivation document and the particular motivation award. Although plug-ins are generally known, applicant requests that the Examiner cite a reference which supports the Examiner's position that plug-ins in the context of claims 7 and 15 would be obvious.

It is felt that a full and complete response has been made to the Office action and, as such, places the application in condition for allowance. Such allowance is hereby respectfully requested. If the Examiner feels, for any reason, that a personal interview will expedite the prosecution of this application, he is invited to telephone the undersigned.

If there are any additional charges in this matter, please charge Deposit Account No. 19-1345.

Respectfully submitted,

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